



San Diego County Sheriff's Department

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William D. Gore, Sheriff

September 3, 2019

Alfred Ng
C/O MuckRock News
Dept MR 79206
411A Highland Ave.
Somerville, MA 02144-2516

79206-16374188@requests.muckrock.com

VIA EMAIL AND U.S. MAIL

Dear Mr. Ng:

The San Diego County Sheriff's Department is in receipt of your request dated and received August 23, 2019, requesting records and information pursuant to the California Public Records Act (CPRA). Specifically you request:

"Email communications between Raymond Pollum, Ring's head of law enforcement partnerships, and your police department. We are also seeking any emails among the police department related to Ring and the Neighbors app. We are requesting emails from 2017 to the present date."

The San Diego County Sheriff's Department employs over 4,000 individuals. A request such as this one, which seeks records of communication "among the police department related to Ring and the Neighbors app" would be an overly burdensome task that would likely support a denial pursuant to Government Code section 6255. The Sheriff's Department undertook a targeted inquiry which focused on those individuals who had communication with Raymond Pollum and Ring LLC regarding the Neighbors application.

The Sheriff's Department attached responsive emails, "Emails," containing communications between the Sheriff's Department and Ring LLC. Pursuant to California Government Code section 6255, the Sheriff's Department redacted the phone numbers, and email addresses of members of the public. The public interest served by releasing personal information of members of the public is substantially outweighed by the individual privacy interest of the member of the public. Additionally, the Sheriff's Department redacted the meeting identification password. Further, the Sheriff's Department redacted employees' phone numbers. Please contact the Sheriff's Department to contact a specific employee.

The draft Memorandum of Understanding referenced in the emails is exempt pursuant to California Government Code section 6254(a) and 6255. This draft document does not reflect the finalized version of the Memorandum of Understanding, and is not retained by the public agency in the ordinary course of business. The public interest in the release of a draft document is

outweighed by the public interest served by non-disclosure. During the drafting process, a public agency has the ability to change the wording and terms before distributing the final product. The Sheriff's Department is providing the finalized "Memorandum of Understanding."

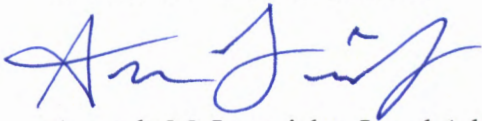
Additionally, records of a law enforcement investigation, or any investigatory or security files compiled by a law enforcement agency are exempt from disclosure. Cal. Gov't. Code § 6254(f); *Haynie v. Superior Court* (2011) 26 Cal. 4th 1061, 1071-72.

Further, documents protected by Attorney-Client privilege and/or the Attorney Work Product doctrine are exempt pursuant to California Government Code section 6254(k).

Lastly, copyrighted training documents provided by Ring are prohibited from release pursuant to California Government Code section 6254(k). Please contact the Sheriff's Department if you would like to set up a time to view these documents.

Sincerely,

WILLIAM D. GORE, Sheriff



Amanda M. Lomnicky, Legal Advisor
Office of the Sheriff – Legal Affairs Unit